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**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

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RUSS GODFREY, and NATALIE  
GODFREY,

Plaintiffs,

v.

CSAA FIRE & CASUALTY  
INSURANCE COMPANY,

Defendant.

Case No: 5:19-cv-329 JD

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**PLAINTIFFS' VOIR DIRE REQUEST**

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**1. Connection with insurance industry.** Persons who have strong connections to or are employed by the insurance industry could obviously be biased in favor of Defendant, CSAA Fire & Casualty Insurance Company.

- Are any of you employed in the insurance industry?
- Are any of you employed as an adjuster or insurance agent?
- Are your family members or close friends so employed?
- Do any of you have insurance with CSAA Fire & Casualty Insurance Company?
- If so, what type of insurance do you carry with CSAA Fire & Casualty Insurance Company?

**2. Connections with Russ Godfrey and Natalie Godfrey, or the building.** Plaintiffs request that the Court voir dire the prospective jurors about any potential interactions they may have had with Russ Godfrey and Natalie Godfrey:

- Have any of you had any business dealings with Russ Godfrey or Natalie Godfrey?
- If any of the prospective jurors answer yes to the previous question, please inquire as to how they are acquainted with Russ Godfrey and/or Natalie Godfrey, and whether anything about that acquaintance might cause them to unduly favor or be against one of the parties to this action.

**3. Prior jury experience.** For members of the panel that have served on a jury in the past, it is important to know whether or not they were the foreperson of the jury and whether they understand the difference in the burden of proof for a criminal case. Therefore, Plaintiffs respectfully request that the Court make the following inquiries:

- Have you served on a jury in the past?
- If so, were you the foreperson of the jury?
- Was it a civil or criminal case?
- If it was a criminal case, do you understand that there is different, higher burden of proof in a criminal trial than a civil trial?
- Was there a verdict reached?

**4. Litigation bias.** Persons who have been involved in frequent litigation in the past, especially as a defendant, can develop a bias in lawsuits, regardless of the merits of the case. Plaintiffs would respectfully request the Court to inquire as follows:

- Have any of you or a close family member or close friends been involved in

litigation in the past? For example, a civil case, worker's compensation action, contract dispute, employment dispute or an insurance claim dispute?

- As a plaintiff or defendant?
- Has anything about that litigation experience caused you to develop strong feelings one way or the other either for or against plaintiffs in civil litigation?

**5. Construction, roofing, plumbing, contracting experience or employment.**

- Are you or any of you or your close family members or close friends involved in the trades of construction, roofing, plumbing, or contracting?
- Are any of you or your close friends or family involved in water mitigation remediation or clean up?

**MANSELL ENGEL & COLE**

By: s/ Keith F. Givens  
Steven S. Mansell, OBA #10584  
Mark A. Engel, OBA #10796  
Keith F. Givens, OBA #16501  
204 North Robinson Avenue, 21<sup>st</sup> Floor  
Oklahoma City, OK 73102-7001  
T: (405) 232-4100 \*\* F: (405) 232-4140  
Firm E-mail: [kgivens@meclaw.net](mailto:kgivens@meclaw.net)  
**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 7, 2020, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Gerard F. Pignato ([jerry@ryanwhaley.com](mailto:jerry@ryanwhaley.com))  
Matthew C. Kane ([mkane@ryanwhaley.com](mailto:mkane@ryanwhaley.com))  
Joshua K. Hefner ([joshua@ryanwhaley.com](mailto:joshua@ryanwhaley.com))  
Susan F. Kane ([susanfkane@gmail.com](mailto:susanfkane@gmail.com))

**ATTORNEYS FOR DEFENDANT,  
CSAA FIRE AND CASUALTY INSURANCE**

s/Keith F. Givens  
Keith F. Givens